

**Exhibit 1**

Dr. Abdullah Naseef's  
Motion to Dismiss the Third Amended Complaint

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<i>IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001</i>	)	03 MDL No. 1570 (RCC)
	)	
	)	
<i>THOMAS E. BURNETT, SR., et al.</i>	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
<i>v.</i>	)	C.A. No. 03 CV 9849 (RCC)
	)	
<i>AL BARAKA INVESTMENT AND DEVELOPMENT</i>	)	
<i>CORPORATION, et al.</i>	)	
	)	
<i>Defendants.</i>	)	
	)	

**DECLARATION OF ABDULLAH NASEEF**

I, Dr. Abdullah Naseef, being duly sworn, declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth below of my own personal knowledge.
2. I have been informed by my attorney that I am a defendant (D97) in the above-captioned action. I am submitting this declaration in support of my Motion to Dismiss for lack of personal jurisdiction and improper service of process.
3. I was born in 1939, in Jeddah, Saudi Arabia, and have lived in Saudi Arabia all of my life. I have always been a citizen of the Kingdom of Saudi Arabia.
4. I am a Professor of Geology, at King Abdulaziz University, Jeddah.
5. I was the Secretary-General of the Muslim World League from 1983 until 1993. The Muslim World League is a charity that is sponsored and supported by the Saudi government. In my capacity as Secretary-General, I also served as an officer of the Rabita Trust from 1988 to

1993. The Rabita Trust is a charity that is partly owned by the Muslim World League, and partly owned by the government of Pakistan.

6. In 1993, I was appointed by Royal Decree to the Saudi Majlis-ash-Shura, which is the legislative body of the Saudi government, equivalent to a Parliament in other countries. I became the Deputy Speaker (or Vice President) of the Majlis-ash-Shura, and retired in 2001.

7. I have visited the United States on several occasions since 1965 to study at Stanford University, with my last visit being in 2002 to attend the World Economic Forum Conference. Although I do not now remember the dates, nature, or purposes of all of my visits, these included official visits to attend academic conferences, as well as conferences relating to the Scouting movement. I also made several visits as a tourist.

8. I own no real property in the United States. I also have no bank accounts, and have no investments in the United States. I do not conduct any personal business with any businesses in the United States.

9. I do not subscribe to or read either the *International Herald Tribune* or the *Al Quds al Arabi*. The latter publication, to my knowledge, is banned in the Kingdom of Saudi Arabia.

10. I have never supported the loss of innocent life and believe that there is no justification for the tragic attacks of September 11, 2001. I have never supported any person or organization that I have known to participate in terrorist activities. On September 13, 2001, two other Saudis and I sent a letter to President Bush, which expressed "our condemnation and denunciation of the horrible acts of terrorism perpetrated against the American people and security." We emphasized that these acts were totally contrary to "Islamic values and teachings." See A. Naseef, *et al.*, Letter to President Bush (Sept. 13, 2001) (attached hereto as

Exhibit 1). After receiving a response to our letter, *id.*, I reiterated our willingness to “to work together towards peace in the Middle East and in the world.” See A. Naseef, Letter to President Bush (Dec. 31, 2001) (attached hereto as Exhibit 2).

11. The Third Amended Complaint in this case has no allegations about me, other than in three paragraphs. In Paragraph 273 of the Third Amended Complaint, it is stated that the Rabita Trust “is connected to the SAAR Network through two officers,” including myself. Although I served as an officer of the Rabita Trust from 1988 to 1993 in my capacity as Secretary-General of the Muslim World League, I was not involved in the day-to-day operations or activities of the SAAR Network or its components. I deny that I had any knowledge of any activities of the SAAR Network that were terrorist activities, or knowingly supported terrorism.

12. Similarly, in Paragraph 274 of the Third Amended Complaint, it is stated that I “founded the Rabita Trust in July 1988 and [am] currently its chairman.” This is incorrect, since I have not been an officer of the Rabita Trust since 1993, and I believe that Wael Jalaidan is the current Secretary General. I have not made any personal donations to the Rabita Trust. I deny that I had any knowledge of any activities of the Rabita Trust that were terrorist activities, or knowingly supported terrorism. I have no knowledge of the day-to-day operations or activities of the Rabita Trust since 1993.

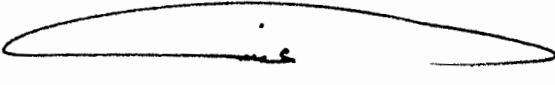
13. In Paragraph 275 of the Third Amended Complaint, it is stated that as part of my “global efforts” to “spread Muslim World League offices around the world,” I was “involve[d] in a SAAR Network charity,” as an “officer of Makkah-al-Mukkaramah, Inc., registered in Virginia as a non-profit charity.” I had no involvement with the day-to-day activities or operations of the SAAR Network or the Makkah-al-Mukkaramah, Inc., and I deny that I had any knowledge of any activities of either entity that were terrorist activities, or knowingly supported

terrorism.

14. I can read and understand English.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



  
Dr. Abdullah Naseef

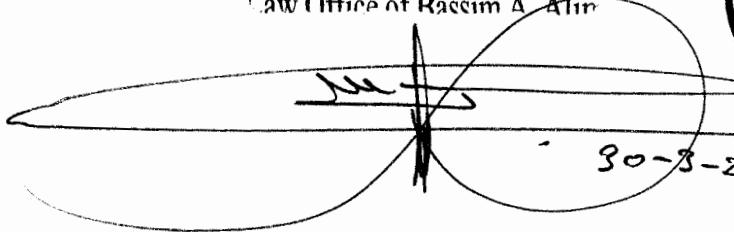
Executed on the 30 day of March, 2004.

This is to certify that  
This is the true Signature of the Above Signer  
Without Responsibility of the Contents

*Bassim A. Alim, Esq.*

Law Office of Bassim A. Alim



  
30-3-2004

**Attachment 1 to Naseef Declaration**

Dr. Abdullah Naseef's  
Motion to Dismiss the Third Amended Complaint

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)

**His Excellency President George Bush  
President of the United States of America  
September 13, 2001**

We would like to express to your Excellency our condemnation and denunciation of the horrible acts of terrorism perpetrated against the American people and security. We would like also to express to you and your family personally and to the victims families and friends and all the friendly people of the United States our deep sorrow and sincere condolences and sympathy.

We would like also to stress upon the fact that Islamic values and teachings totally reject all kinds of violence and acts of terrorism. Islam lays emphasis on the inviolability as well as the sanctity of both human life and dignity regardless of national affiliation, religion, color and/or ethnic background. The value of human lives is highly valued in Islam thus it deems killing one soul with out a just cause is like killing the entire people and saving one soul is a saving the lives of humanity at large. Muslims consider any aggression against innocent people an aggression against God's prohibition and eternal values. In fact, Muslims view such an aggression as deplorable and disgusting.

In addition, we would like to convey our appreciation for your Excellency's noble gesture when you expressed your eagerness about the safety of Arab and Muslims citizens and rejected the cheap media intrigues spread against by parties that are notorious for their hostility against Arabs and Muslim. These parties are known to have made prescriptions leveling accusations against Arabs and Muslims whenever the American people are exposed to a painful accident or detestable aggression. Obviously, the goal of this parties-historically notorious for their trickery is to mislead, confuse, and divert the right course followed the American security agents in pursuing and identifying criminals. The aim of these parties is to obtain the sympathy of the good American people and incite their wrath against Arabs and Muslims so as to justify the on-going massacre they are penetrating against the Palestinian people and destruction of their homes and properties. Sweeping away their palm land, which is an act of genocide unprecedented in the history of mankind.

Finally, we would like to reaffirm to your Excellency our firm conviction that the acts of violence are not the right path to achieve peace and security for people and societies. The right path to achieve all is to have dialogue, justice and to confirm mutual respect between different cultures and civilization.

**Dr. Abdullah Bin Omar Nassif  
President of the World Muslim Congress**

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**Dr. Hamid Bin Ahmad Al-Rifaie  
President of International Islamic Forum for Dialogue**

**Dr. Abdullah Bin Biah  
Former Minister of Justice  
Professor of the University of King AbdulAziz**

**Attachment 2 to Naseef Declaration**

Dr. Abdullah Naseef's  
Motion to Dismiss the Third Amended Complaint

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)



CONSULATE GENERAL OF THE  
UNITED STATES OF AMERICA

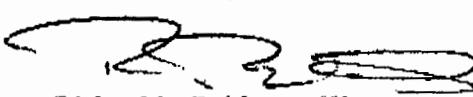
Jeddah  
December 6, 2001

**Dr. Abdullah Bin Omar Naseef**  
**President of the Muslim World Congress**

Dear Dr. Naseef:

I have the pleasure of delivering the enclosed letter to you on behalf of James Larocco, Acting Assistant Secretary of State for Near Eastern Affairs, U.S. Department of State, in response to your letter of September 15 to President Bush.

Yours sincerely,



Richard L. Baltimore III  
Consul General

**Dr. Naseef, Dr. AL-RIFAIE, and Dr. Bin Bish, received a letter From U.S.A President Bush Responding on their Latter, Dated 15 September, which was sent to him, regarding terrorist attacks of 11 September.**

**Please find in the following the complete text of the litter:**



**Thank you very much for your letter of September 15 offering your kind expression of condolence and friendship and I appreciate your support during this challenging time for the American people.**

The United States has welcomed the support of Muslim leaders around the world who have denounced the terrorist attacks of September 11 and rejected any justification for them under Islam. We in the United States know that our fellow Muslim citizens, and our Muslim friends abroad, practice a religion that affirms life and denounces violence. The United States remains committed to working with our Muslim friends to build a more secure, peaceful, and tolerant world for all people.

We hope that the Muslim World Congress will join us in reaching out to other cultures and religions in our efforts to work together toward peace in the Middle East and in the world. Only through mutual understanding and respect will we achieve the peace and security that we are all seeking.

**Thank you again for your letter..**

# World Muslim Congress

President's Office



# مؤتمر العالم الإسلامي

مكتب الرئيس

Date : ..... التاريخ .....

Ref : ..... الرقم .....

31/12/2001

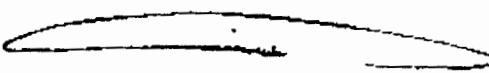
**H. E. President George W. Bush**  
**President,**  
**United States of America**

I have received on 4 December through the Consul General of America in Jeddah your esteemed letter signed by Mr. James A. Larocco, acting Assistant Secretary of State for Near Eastern Affairs, in response to our letter dated 15 September 2001.

I personally, and on behalf of my colleagues Prof. Kamil E. Al-Shareef, Secretary General of International Islamic Council for Daw'a and Relief, Prof. Dr. Hasmid. A. Al-Rifaie, President of International Islamic Forum for Dialogue, and Prof. Dr. Abdullah Bin Biah, Professor of Islamic Law at K.A.A. University welcome your invitation to Muslim World Congress to join your efforts to work together towards peace in the Middle East and in the world.

We are ready to meet any representative assigned by your Excellency in order to discuss together the ideas and views which may help both of us to reach a reasonable and practical plan to achieve this noble goal.

Thank you with best wishes

  
**Prof. Dr. Abdullah Omar Nasseef**  
**President**  
**World Muslim Congress**

P.O. Box 149  
Jeddah 21411  
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FAX: (966) (02) 669-2991

## American Consulate Jeddah

To: Dr. Abdullah Omar Nasseeft  
President  
World Muslim Congress

From: Mark A. Caudill  
Consul (Political)

FAX: 669 - 3362

Pages: ①

Phone: 661 - 3682

Date: 01/02/02

Dear Dr. Nasseeft:

Thank you for your letter to President Bush which we received today. We have forwarded it to the Department of State in Washington, DC, for passage to the White House.

Sincerely,

مister. الدكتور جعفر النجاشي